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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,
Plaintiff,
v.
MARY ANN BLIESNER,
VALLEY PROCESSING, INC.,
Defendants.

Case No. 1:22-CR-2097-SAB

**DEFENDANT'S UNOPPOSED
MOTION TO CONTINUE
SENTENCING HEARING AND
ASSOCIATED FILING
DEADLINES AND REQUEST
FOR EXPEDITED
CONSIDERATION**

**Without Oral Argument:
February 18, 2025, at 6:30 pm**

COMES NOW, Defendant Mary Ann Bliesner, by and through her attorneys of record, Carl J. Oreskovich and Andrew M. Wagley of Etter, McMahon, Lamberson, Van Wert & Oreskovich, P.C., and hereby moves this

Court for a continuance of the currently scheduled Sentencing Hearing and all associated filing deadlines. This Motion is based upon the files and records contained in the Court File herein. Defendant further requests this Motion be considered on an expedited basis based upon the current sentencing deadlines. Defense Counsel's office has been in contact with Mrs. Bliesner who indicated she has no objection to continuing the sentencing hearing. As indicated below, this Motion is unopposed by Assistant United States Attorney (AUSA) Dan Fruchter, Probation Officer, Jennifer Dykstra, and Co-Defendant Valley Processing Inc., by and through its counsel of record.

MEMORANDUM OF LAW

In general, “[t]he court must impose sentencing without unnecessary delay.” Fed. R. Crim. P. 32(b)(1). However, “[t]he court may, for good cause, change any time limits” for sentencing. Fed. R. Crim. P. 32(b)(2). For the reasons indicated herein, good cause exists to grant this continuance request.

In the situation at hand, Mrs. Bliesner respectfully requests a continuance of the Sentencing Hearing currently scheduled for March 26, 2025, and all associated filing deadlines, (including those related to the Draft Presentence Investigation Report), for 30 to 60 days, depending on the Court's availability.

This continuance is necessary as additional time is needed to schedule the Presentence Investigation Interview, gather sentencing materials (including letters of support), and to prepare for the Sentencing Hearing. The applicable parties have been delayed based upon the Holidays and various scheduling conflicts. Furthermore, Defense Counsel is unavailable for the Presentence Investigation Interview for a majority of this month based upon a preplanned vacation.

This is the first request for a continuance of the Sentencing Hearing in this matter. As indicated above, this Motion is unopposed by all involved parties. As such good cause exists to grant this continuance.

CONCLUSION

Based upon the foregoing, Mrs. Bliesner respectfully requests that this Court grant this Unopposed Motion to Continue the Sentencing Hearing and Associated Filing Deadlines and reset Mrs. Bliesner's Sentencing Hearing out 30 to 60 days. This request specifically includes the extension of all associated deadlines, including those related to the Draft Presentence Investigation Report.

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1 RESPECTFULLY SUBMITTED this 11th day of February, 2025.
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7 ETTER, McMAHON, LAMBERSON,
8 VAN WERT & ORESKOVICH, P.C.
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11 By: /s/ Andrew M. Wagley
12 Carl J. Oreskovich, WSBA #12779
13 Andrew M. Wagley, WSBA #50007
14 *Attorneys for Defendant Mary Ann Bliesner*
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1 **CERTIFICATE OF SERVICE**
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3 I hereby certify that on February 11, 2025, I electronically filed the
4 forgoing document with the Clerk of the Court using the CM/ECF System,
5 which will send notification of such filing to the attorneys of record.
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8 EXECUTED in Spokane, Washington on February 11, 2025.
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11 By: /s/ Jodi Dineen
12 Jodi Dineen, Paralegal
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